

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

IN RE:)	BANKRUPTCY NO. 15-23207-JAD
)	
WILLIAM J. BORLAK)	Chapter 7
)	
Debtor.)	Document No.
)	
JPMC Specialty Mortgage, LLC,)	Hearing: September 6, 2016
its successors and/or assigns)	at 10:00
)	
)	
Movant)	ANSWER TO MOTION FOR RELIEF
)	FROM AUTOMATIC STAY
)	
)	
vs.)	
)	
WILLIAM J. BORLAK, Debtor and)	
ROSEMARY CRAWFORD, Chapter 7)	
TRUSTEE,)	
)	
Respondents.)	

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the debtor, William J. Borlak, by and through his attorney, Max Feldman, Esquire, answers to movant's motion for Relief from Automatic Stay as follows:

1. Paragraph One of movant's motion is admitted.
2. Paragraph Two of movant's motion is admitted.
3. Paragraph Three of movant's motion is admitted.
4. Paragraph Four of movant's motion is a statement to which no response is required and is therefore denied.

5. Paragraph Five of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

6. Paragraph Six of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

7. Paragraph Seven of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

8. Paragraph Eight of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

9. Paragraph Nine of movant's motion is admitted.

10. Paragraph Ten of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

11. Paragraph Eleven of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

12. Paragraph Twelve of movant's motion is denied and strict proof is demanded at the time of hearing.

13. Paragraph Thirteen of movant's motion is denied and strict proof is demanded at the time of hearing.

14. Paragraph Fourteen of movant's motion is denied and strict proof is demanded at the time of hearing.

15. Paragraph Fifteen of movant's motion is denied and strict proof is demanded at the time of hearing.

16. Paragraph Sixteen of movant's motion is denied as a conclusion of law to which no response is required.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

Date: 8-4-2016

Respectfully submitted,

/s/ Max Feldman
Max Feldman, Esquire
Attorney for Debtor
1322 Fifth Avenue
Coraopolis, PA 15108
mcfeldman@verizon.net
412.262.6181 – phone
412.262.6344 – fax
PA I.D. No. 56429